

MEMO ENDORSED

Rosenberg, Giger
& Perala P.C.

1330 Avenue of the Americas
Suite 1800
New York, NY 10019

Tel: (646) 494-5000

June 5, 2020

VIA ECF & E-MAIL

Honorable Katherine Polk Failla
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Chapman Roberts v. BroadwayHD LLC, et al., No. 1:19-cv-09200
(KPF)(RWL)

Dear Judge Failla,

This firm is counsel for defendants Leiber Stoller Productions, Inc., Mike Stoller (sued as Michael Stoller) and the Estate of Jerome Leiber (sued under an incorrect name) in the referenced action (the “L&S Defendants”). Pursuant to Your Honor’s ECF Order dated April 29, 2020, the L&S Defendants’ Motion to Dismiss plaintiff’s First Amended Complaint is due to be filed on or before June 12, 2020. I write, with the consent of plaintiff’s counsel, to advise the Court that plaintiff and the L&S Defendants have begun settlement discussions concerning the resolution of the claims asserted against the L&S Defendants. In order to facilitate and support those discussions, plaintiff and the L&S Defendants respectfully request that the Court adjourn the Motion to Dismiss deadline for four weeks, from June 12, 2020 to July 10, 2020. In the interim, the parties will notify the Court if they are able to settle the claims asserted against the L&S Defendants.

The requested adjournment will necessitate the following amended briefing schedule, but will not require the amendment of any other deadlines in this action:

Opening Brief:	July 10, 2020
Opposition:	August 7, 2020
Reply:	August 21, 2020

Thank you for your considered attention to the foregoing.

Respectfully,

Matthew H. Giger

cc: Counsel for all parties (by ECF)

Application GRANTED. The Court adopts the parties' proposed briefing schedule.

Dated: June 5, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE